

HOWARD & HOWARD ATTORNEYS PLLC
Robert Hernquist, Nevada Bar No. 10616
rwh@h2law.com
Mark Gardberg, Nevada Bar No. 10879
mjg@h2law.com
Adam Ellis, Nevada Bar No. 14514
are@h2law.com
Wells Fargo Tower, Suite 1000
3800 Howard Hughes Parkway
Las Vegas, Nevada 89169-5980
Telephone: (702) 257-1483
Facsimile: (702) 567-1568
Attorneys for Defendant Andrew Fonfa

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SNOW COVERED CAPITAL, LLC

Plaintiff,

vs.

WILLIAM WEIDNER, an individual
ANDREW S. FONFA, an individual;;
DAVID JACOBY, an individual; and
LUCKY DRAGON LP

Defendants.

Case No. 2:19-cv-00595-JAD-NJK

**STIPULATION TO EXTEND BRIEFING
SCHEDULE ON DEFENDANT ANDREW
FONFA'S MOTION FOR PROTECTIVE
ORDER**

(First Request)

Pursuant to Local Rule 7-1, LR IA 6-1, and LR IA 6-2, Plaintiff Snow Covered Capital, LLC and Defendants Andrew Fonfa, William Weidner, David Jacoby and Lucky Dragon LP hereby stipulate and agree that Defendants shall have up to and including **August 13, 2019**, to file a Reply to Plaintiff SCC's Response to Defendant Fonfa's Motion for Protective Order (filed July 23, 2019) and His Co-Defendants' Joinders in That Motion. This is the first stipulation for extension of time to file replies.

1. On July 23, 2019, Fonfa filed his Motion for Protective Order. (ECF 58). Defendants Weidner, Jacoby and Lucky Dragon LP each filed joinders thereto. (ECF 59 &

60).

2. Pursuant to Local Rule 7-2(b), Plaintiff Snow Covered Capital's Opposition to Fonfa's Motion for Protective Order was due on August 6, 2019, and any Reply in support of the Motion would be due on August 13, 2019.

3. On August 6, 2019, this Court issued an Order providing that all discovery motions in this case shall be briefed on shortened deadlines rather than the deadlines set forth in Local Rule 7-2(b). (ECF 70). Pursuant to that Order, all oppositions to discovery motions are due within four days of service of the motion and replies are due within two days of service of the opposition. (Id.).

4. Later on August 6, 2019, Plaintiff Snow Covered Capital filed its Opposition brief in accordance with the deadline set forth in Local Rule 7-2(b).

5. The parties seek an Order allowing briefing on Fonfa's Motion for Protective Order to be completed in the ordinary course pursuant to the deadlines set forth in Local Rule 7-2(b), with Fonfa's Reply brief being due on August 13, 2019.

6. The parties believe good cause exists for this request. First, Fonfa's counsel is presently on vacation with his family and out of state, and this brief extension will permit counsel to adequately prepare a reply. Second, it promotes fairness as the Court's August 6, 2019 Order was filed while briefing on this motion was underway—if the timeline set forth in the Order are applied to Fonfa's Motion for Protective Order, Plaintiff will have been provided the fourteen days to prepare its Opposition that is provided in Local Rule 7-2(b) while the time for Fonfa's Reply will have been shortened to two days pursuant to the Court's Order.

SNELL & WILMER

/s/ Bob L. Olson
BOB L. OLSON (NBN 3783)
NATHAN G. KANUTE (NBN 12413)
3883 Howard Hughes Pkwy., Suite 1100
Las Vegas, Nevada 89169
Tel.: (702) 784-5200
Email: bolson@swlaw.com

SANTORO WHITMIRE

/s/ Nicholas J. Santoro
NICHOLAS J. SANTORO, ESQ.
Nevada Bar No. 532
OLIVER J. PANCHERI, ESQ.
Nevada Bar No. 7476
10100 W. Charleston Blvd., Suite 250
Las Vegas, Nevada 89135

nkanute@swlaw.com

JAMES D. MCCARTHY (Admitted pro hac vice)
JASON P. FULTON (Admitted pro hac vice)
DIAMOND MCCARTHY
2711 N. Haskell Ave., Suite 3100
Dallas, Texas 75204
Tel.: (214) 389-5300
Email: jmccarthy@diamondmccarthy.com
jfulton@diamondmccarthy.com
Attorneys for Plaintiff Snow Covered Capital, LLC

Tel.: (702) 948-8771 / Fax: (702) 948-8773
Email: nsantoro@santoronevada.com
opancheri@santoronevada.com
*Attorneys for Defendants William Weidner
and David Jacoby*

HOWARD & HOWARD ATTORNEYS

/s/ Robert W. Hernquist
ROBERT W. HERNQUIST (NBN 10616)

MARK GARDBERG (NBN 10879)
3800 Howard Hughes Pkwy., Suite 100
Las Vegas, Nevada 89169
Tel.: (702) 257-1483 / Fax: (702) 5697-1568
Email: rwh@h2law.com
mg@h2law.com
Attorneys for Defendant Andrew Fonfa

GERRARD COX LARSEN

/s/ Douglas D. Gerrard
DOUGLAS D. GERRARD (NBN 4613)
GARY C. MILNE (NBN 3653)
2450 Saint Rose Parkway, Suite 200
Henderson, NV 89074
Tel.: (702) 796-4000 / Fax: (702) 796-4848
Email: dgerrard@gerrard-cox.com
gmilne@gerrard-cox.com
*Attorneys for Shelley D. Krohn, Chapter 7
Trustee of Lucky Dragon, LP Estate*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: August 9, 2019